

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

L.J., individually and on behalf of B.A.J., a child
with a disability,

Plaintiff,

-v-

NEW YORK CITY DEPARTMENT OF
EDUCATION, NEW YORK CITY BOARD OF
EDUCATION, and DAVID BANKS, in his official
capacity as Chancellor of the New York City School
District,

Defendants.

Case No. 23-cv-7267 (ER)(SDA)

Hon. Edgardo Ramos

**DECLARATION OF NATHAN J. ADES IN SUPPORT OF
PLAINTIFF'S MOTION TO SEAL DOCUMENTS**

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Attorneys for Plaintiffs

I, Nathan J. Ades, an attorney duly admitted to practice before this Court, hereby declare, under penalty of perjury, as follows:

1. I am an associate of the law firm Glenn Agre Bergman & Fuentes LLP (“Glenn Agre”), which along with Advocates for Children (“AFC”), serves as counsel for the Plaintiff L.J. in the above captioned matter. I have personal knowledge of the matters stated in this Declaration.

2. I have reviewed Exhibits 1-25 of the Ades Declaration, Exhibits 1-7 of the Shore Declaration, and Exhibits 1-9 of the Rodriguez Declaration in support of Plaintiff’s Motion for Summary Judgment. The information contained in the identified exhibits of the Motion for Summary Judgment is confidential to L.J. and her daughter, B.A.J and I believe there is a substantial risk that B.A.J would be deprived of this right to privacy and would suffer harm if the information were released to the public.

3. The information contained in the exhibits contains B.A.J.’s full name as well as confidential medical and educational records. Disclosure of confidential and medical records to the public creates a risk of the improper use of such information which can cause social and economic harm including embarrassment and discrimination.

4. For these reasons, I believe it is highly possible that B.A.J could suffer substantial personal harm if the information set out in paragraph 2 were made public.

5. Pursuant to the Court’s Individual Rules and Practices in Civil Cases, Rule 4.B.i, the parties conferred about this sealing motion and Defendants consented to Plaintiff’s request to file these exhibits under seal on February 9, 2024.

2. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed in New York, New York on February 9, 2024.

/s/ Nathan Joseph Ades
Nathan Joseph Ades